

## Koch, Kristine

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**From:** Koch, Kristine  
**Sent:** Thursday, December 05, 2013 12:01 PM  
**To:** 'Carl Stivers'; Humphrey, Chip  
**Cc:** James McKenna; Jennifer Woronets; Amanda Shellenberger  
**Subject:** RE: Follow Up Question to EPA's November 13 PRGs Presentation

Carl, here are the responses to your questions:

Please confirm the EPA November 13 Fish Consumption PRGs are based on the following assumptions:

- Subsistence fisher scenario

Yes.

- Consumption of fillets (not whole body). Is this skin on or skin off?

Fillets. Target tissue concentrations are blind to a particular part of the fish consumed. The food web model calculates a whole-body concentration. Thus, the target concentration in the FWM represented a whole body value adjusted to provide the desired risk-based tissue concentration in fillet based on the concentrations ratios observed in the RI sampling. Target risk-based tissue concentrations are also blind to whether the skin is on or off the fillet. That's a measurement issue, not a PRG issue.

- Multi-species diet, which is defined per the BHHRA as comprised of equal proportions of the four resident fish species for which data were collected (smallmouth bass, common carp, brown bullhead, and black crappie).

Yes.

- Site-wide exposure consistent with the multi-species diet.

PRGs, as represented by risk-based concentrations, don't consider (and there is no provision **\*for\*** considering) exposure area. That issue is addressed in the application of the PRG.

Regards,

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**From:** Carl Stivers [<mailto:cstivers@anchoragea.com>]  
**Sent:** Thursday, December 05, 2013 10:17 AM  
**To:** Humphrey, Chip; Koch, Kristine  
**Cc:** James McKenna; Jennifer Woronets; Amanda Shellenberger  
**Subject:** Follow Up Question to EPA's November 13 PRGs Presentation

Chip and Kristine – We were hoping we could get a few simple questions answered/confirmed on the fish consumption PRGs while we are waiting for more EPA information on these PRG methods.

Please confirm the EPA November 13 Fish Consumption PRGs are based on the following assumptions:

- Subsistence fisher scenario
- Consumption of fillets (not whole body). Is this skin on or skin off?
- Multi-species diet, which is defined per the BHHRA as comprised of equal proportions of the four resident fish species for which data were collected (smallmouth bass, common carp, brown bullhead, and black crappie).
- Site-wide exposure consistent with the multi-species diet.

Thanks.

Carl

**Carl Stivers**

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